

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff)	
)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

**DEFENDANTS ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S
DEPARTMENT AND SUFFOLK COUNTY'S MOTION FOR SUMMARY
JUDGEMENT.**

Now come the Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County and pursuant to Fed. R.Civ. P. 56(c) respectfully request that this Court enter summary judgment in their favor.

As grounds therefore the Defendants contend that no genuine issues of material fact exist and they are entitled to judgment as a matter of law on all Counts of the Plaintiff's Amended Complaint. The Defendants further rely on the attached Memorandum of Law and Exhibits.

Respectfully submitted
For all DEFENDANTS
By their attorney

/s/ Ellen M. Caulo
Ellen M. Caulo, BBO #545250
Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114

Dated:
October 17, 2005

